

August 31, 2016

VIA ONLINE SUBMISSION (foiaonline.regulations.gov)

Regional Freedom of Information Officer
U.S. EPA, Region 9
75 Hawthorne Street (OPA-2)
San Francisco, CA 94105

Re: ***Freedom of Information Act Request:
Omega Chemical Corporation Superfund Site***
Our Client: Continental Heat Treating, Inc.

Dear Sir/Madam:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, *et seq.*, we write to request the public records described below, which are related to the Omega Chemical Corporation Superfund Site, listed on the National Priorities List on January 19, 1999, 64 Fed. Reg. 2950 ("Omega Site").

We hereby offer to pay the fees covering the direct costs of duplication. This request falls within category (g)(4), "all other requests" under 49 C.F.R. § 7.42(g) as it is being sought in connection with ongoing litigation. We also request that exact copies of the requested writings be provided, unless it is impracticable to do so.

The records requested writings are as follows:

1. Any and all writings reflecting EPA's claims or potential claims pursuant to CERCLA against ExxonMobil Oil Corporation ("ExxonMobil"), or any of its predecessors, for costs associated with Operable Unit – 1 ("OU-1") of the Omega Site between January 1991 and December 2005.
2. Any and all writings reflecting ExxonMobil's or any of its predecessors' arranging for the disposal or treatment of hazardous substances at the former Omega Chemical Corporation facility, located at 12504 and 12512 East Whittier

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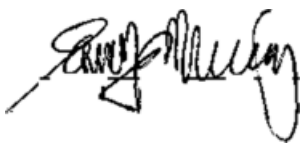
Boulevard in Whittier, California ("former Omega property") prior to December 2005.

3. Any and all writings constituting "notice letters" or requests for information from EPA to ExxonMobil, or any of its predecessors, regarding ExxonMobil's (or its predecessor's) potential liability under CERCLA for OU-1 of the Omega Site between January 1991 and December 2005.
4. Any and all writings authored by or on behalf of ExxonMobil, or any of its predecessors, and sent to EPA in response to EPA "notice letters" or requests for information from EPA regarding ExxonMobil's (or its predecessor's) potential liability under CERCLA for OU-1 of the Omega Site between January 1991 and December 2005.

We thank you in advance for your prompt cooperation and assistance with respect to this request. If you have any questions or comments, or require additional information or clarification with respect to this request, please do not hesitate to contact our office.

Very truly yours,

WOOD, SMITH, HENNING & BERMAN LLP



By: _____
EMIL A. MACASINAG

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